

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: JULIA N ARMSTRONG and DARREN C ARMSTRONG	Case No. 21-13379-mdc
JULIA N ARMSTRONG and DARREN C ARMSTRONG, Movant	Chapter 13
vs.	
FREEDOM MORTGAGE CORPORATION, Respondent	

**CONDITIONAL NON-OPPOSITION RESPONSE TO EXPEDITED MOTION TO
SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND
ENCUMBRANCES**

COMES NOW, Freedom Mortgage Corporation ("Respondent"), by and through its undersigned counsel, and hereby responds to Debtor's Expedited Motion to Sell Real Property Free and Clear of Liens and Encumbrances (Doc. 17) filed on January 17, 2022 and in support thereof, shows unto the Court as follows:

1. Admitted.
2. Admitted.
3. Respondent does not have information necessary to admit or deny the averment in Paragraph 3. Strict proof is demanded at trial.
4. Admitted as represented in the Sales Agreement attached to the Debtors' Motion.
5. Admitted.

6. Admitted.

7. Respondent does not have information necessary to admit or deny the averment in Paragraph 7. Strict proof is demanded at trial.

8. Debtor's counsel has been provided a payoff quote on January 20, 2022 that provides for a total amount of \$251,076.31 due to the Respondent through February 19, 2022, at which point and updated payoff quote will be needed.

9. Respondent does not have information necessary to admit or deny the averment in Paragraph 9. Strict proof is demanded at trial

WHEREFORE, Respondent objects to any Order permitting sale of the property without the following:

- a. Respondent's lien is paid in full from the closing proceeds, pursuant to a proper payoff quote obtained prior to and good through the closing date; or
- b. Any short payoff is approved by Respondent; and
- c. Debtor shall have ninety (90) days from entry of the Order to sell the

Real Property.

/s/ Matthew Fissel

Matthew Fissel

(Bar No. 314567)

Attorney for Respondent

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x4535

Facsimile: 704-369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: JULIA N ARMSTRONG and DARREN C ARMSTRONG	Case No. 21-13379-mdc
JULIA N ARMSTRONG and DARREN C ARMSTRONG, Movant	Chapter 13
vs.	
FREEDOM MORTGAGE CORPORATION, Respondent	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of Response to Debtor's Expedited Motion to Sell Real Property Free and Clear of Liens and Encumbrances has been electronically served or mailed, postage prepaid on this day to the following:

JULIA N ARMSTRONG
50 NETTLETREE LN
LEVITTOWN, PA 19054-3304

DARREN C ARMSTRONG
50 NETTLETREE LN
LEVITTOWN, PA 19054-3304

BRAD SADEK, Debtor's Attorney
Sadek and Cooper
1315 WALNUT ST STE 502
PHILADELPHIA, PA 19107

KENNETH E WEST, Bankruptcy Trustee
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106
USTPRegion03.PH.ECF@usdoj.gov

January 24, 2022

/s/ Matthew Fissel
Matthew Fissel
(Bar No. 314567)
Attorney for Respondent
BROCK & SCOTT, PLLC
302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x4535
Facsimile: 704-369-0760
E-Mail: PABKR@brockandscott.com